Ryan K. Biggs
Health, Safety & Environment
Manager

ConocoPhillips Company
Ferndale Refinery
3901 Unick Road – P.O. Box 8

ConocoPhillips

February 1, 2011
HSE580.003 – File No. 6.4.3.1.5.5

U.S. Environmental Protection Agency
International Compliance Assurance Division
Ariel Rios Building
Mail Code 2254A
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: Hazardous Waste Primary Exporter Annual Report 2010

Dear International Compliance Assurance Division:

The following information is provided pursuant to the requirement of 40 CFR 262.56, 262.87(a).

1. **Exporter Information:**
   EPA Identification Number: WAD009250366
   Name: ConocoPhillips Company, Ferndale Refinery
   Mailing Address: P.O. Box 8, Ferndale, WA 98248
   Site Address: 3901 Unick Road, Ferndale, WA 98248

2. **Report Calendar Year:** 2010

3. **Name and Address of each Consignee:**

Consignee	AOC No.	Name	Address
PS13075(02)	505/09; 001136/8E/10	Envirogreen Technologies Ltd.	LELA Lot 401, Similco Mine Site Princeton, BC, Canada V0X 1W0

ConocoPhillips Ferndale Refinery
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4. **Consignee and Waste Information:**

Consignee	Haz. Waste Description	EPA Waste Code	DOT Hazard Class	Transporter Name and EPA ID No.	No. of Shipments	Total Pounds
PS13075(02)	Waste Petroleum Refinery Oil/Water/Sludge Residue	F037	9	MP Environmental Services, Inc. CAT00624247	35	931,870

5. **Description of efforts to reduce volume and toxicity of waste generated and comparisons with previous years:**

Efforts to reduce the volume and toxicity of the F037 sludges consist of separating free liquids (oil and water) from the solids by means of plate and frame pressing. The solids are transported to a thermal desorption facility in British Columbia, Canada. The treated solids are utilized in a mine restoration project in British Columbia. The recovered oil is returned to the Ferndale refining process as feedstock and the separated water is sent to, and treated in, the refinery's Wastewater Treatment Plant (WWTP). Compared to annual volumes over the previous 5 years, the 2010 solids represent a reduced amount of waste generated from cleaning activity of the WWTP storage tanks and oil/water separators.

6. **Certification:**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

If you have questions about this report or require further information, please contact Tim Johnson at (360) 384-8368.

Sincerely,

Ryan Biggs

Ryan K. Biggs

RKB; TDJ:kjh